

June 24, 2013

VIA ECF

Honorable David E. Peebles
United States District Court
Northern District of New York
100 S. Clinton Street, P.O. Box 7367
Syracuse, New York 13261-7367

Re: 33 Seminary LLC, et al. v. The City of Binghamton, et al.
Index No. 3:11-cv-1300 (MAD)(DEP)

Dear Judge Peebles:

On behalf of my firm and co-counsel Newman Ferrara LLP ("Attorneys"), I write to advise Your Honor of Attorneys' intention to file a motion to withdraw as counsel to the plaintiffs in the above-referenced matter. Attorneys have discussed the situation with Isaac Levin, the representative of the plaintiffs, by telephone, and have given him written notice of our intention to move to withdraw.

Accordingly, we respectfully request a 30-day adjournment of the telephonic status conference scheduled for tomorrow, June 25, 2013, at 3:00 pm. An adjournment of 30 days should provide Mr. Levin with sufficient time to retain substitute counsel.

Thank you for your time and consideration.

Respectfully submitted,

COHEN LAW GROUP, P.C.



Brian S. Cohen

cc: VIA ECF

All Counsel of Record (By ECF)
Mr. Isaac Levin (By Email and FedEx – Overnight Delivery)